



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

March 19, 1999

RE: DOE FEMP
COMMENTS: REPORT ON
IDENTIFICATION AND CONTROL OF
INVASIVE PLANT SPECIES

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed the DOE's February 16, 1999 submittal, "Identification And Control Of Invasive Plant Species" Based upon our review Ohio EPA has attached our comments. As stated in the comments, Ohio EPA believes the report provides additional basis for DOE to immediately terminate grazing in the Northern Woodlot.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandegrift, ODH
Manager, TPSS/DERR, CO
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.



**IDENTIFICATION AND CONTROL
OF INVASIVE PLANT SPECIES
1998 ANNUAL REPORT**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code:
 Original Comment #:
 Comment: The report provides additional basis for Ohio EPA's continued position that cattle grazing in the Northern Woodlot is degrading the system by impacting both plant communities and soil erosion. The report provides one more reason for DOE to use all possible means to terminate grazing in the Northern Woodlot at the earliest possible time. Continue grazing only increases the amount of money and time restoration of this area will require.
-) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Purpose and Scope Pg #: 2 Line #: Code:
 Original Comment #:
 Comment: The first bullet under this heading is to "identify all plant species present in the North Woodlot..." and that Phase I calls for a detailed floristic inventory. Then on page five, last paragraph, they say that non-vascular plants were not included. Ohio EPA has concerns that it is not likely that all plant species could have been accounted for in the referenced field visits. The May 1999 Work Plan for Ecological Research Grants states "A floristic analysis will be performed in May, June and August of 1998 to provide an enumeration of dominant plant species in the 100 acre Northern Woodlot" This appears to more appropriately describe the floristic analysis completed.
-) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Floristic analysis Pg #: 5 Line #: 2nd paragraph Code: C
 Original Comment #:
 Comment: There are additional resources for native plants in Ohio and Ohio EPA would like to see more justification for the use of Gleason and Cronquist as the sole source of "indigenous vs non-indigenous" plants.
-) Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Floristic analysis Pg #: 5 Line #: 2nd paragraph Code: E
 Original Comment #:
 Comment: "clasify" is spelled "classify").
-) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Floristic analysis Pg #: 5 Line #: 3rd paragraph Code: C
 Original Comment #:
 Comment: The researcher appears to reach the conclusion that the low abundance of "lower" vascular plants may be attributable to site pollution. Ohio EPA is highly skeptical of any suggestion that pollution impacts to plants are occurring in the northern woodlot. That area is presumed to be low in any kind of "industrial pollution" and attention should be directed towards

Mr. Reising
March 19, 1999
Page 2

other possible causes of the lower than expected frequency of ferns. For example the literature review by Dr. Carolyn Keiffer states that ferns are an important source of food for deer. Impacts of grazing (cattle and deer) and land management are more likely causes of low abundance than site related pollution. The apparent default to "industrial pollution" does not lend much credibility to the project.